

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

LISA A. BRYANT,	: Case No.: 2:20-cv-00594-CDS-EJY
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	:
Plaintiff,	:
	:
v.	: <b>Stipulation for an Extension of Time to</b>
	: <b>File Plaintiff's Reply to Defendants'</b>
MADISON MANAGEMENT SERVICES,	: <b>Opposition to Plaintiff's Motion for</b>
LLC, and WALDMAN & PORRAS, PLLC,	: <b>Summary Judgment and to File Joint</b>
	: <b>Pretrial Order</b>
Defendants.	:
	:
	: <b>[FIRST REQUEST]</b>

- 1 -

1 Plaintiff's Motion for Summary Judgment and for the Parties to file the Joint Pretrial  
2 Order. Plaintiff's counsel (Dann Law) is preparing for a trial and Plaintiff's other counsel  
3 (Freedom Law Firm) was out of the office from April 11, 2022 to April 18, 2022. Defense  
4 counsel is dealing with moving his mother and dealing with deadlines in other matters. This  
5 extension is requested in good faith and is not for purposes of delay or prejudice to any party.

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7 **Procedural History**

8 On March 17, 2022, Plaintiff filed her Motion for Summary Judgment. (ECF No. 62).  
9 Defendants filed their Response in Opposition to Plaintiff's Motion for Summary Judgment  
10 on April 7, 2022. (ECF No. 63). Plaintiff's Reply is due April 21, 2022.

11 THEREFORE, the Parties hereby stipulate and agree to extend the deadline for  
12 Plaintiff's to file a Reply to May 5, 2022. Parties also hereby stipulate and agree to extend the  
13 deadline to file the Joint Pretrial Order to May 12, 2022.

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1 **IT IS SO STIPULATED.**

2 DATED: April 20, 2022

DATED: April 20, 2022

3 FREEDOM LAW FIRM

4 WALDMAN & PORRAS, PLLC

5 By: /s/ George Haines

By: /s/Nicholas M. Porras

6 GEORGE HAINES, ESQ.  
7 Nevada Bar No.: 9411  
8 8985 S. Eastern Ave., Suite 350  
9 Las Vegas, NV 89123  
10 *Attorney for Plaintiff*  
11 LISA BRYANT

NICHOLAS M. PORRAS, ESQ.  
Nevada Bar No.: 12849  
201 West Liberty Street, Suite 207  
Reno, NV 89501  
*Attorney for Defendants*  
MADISON MANAGEMENT SERVICES,  
LLC, AND PORRAS, PLLC

12 DANN LAW FIRM

13 By: /s/ Marc E. Dann

14 Marc E. Dann, Esq.  
15 Ohio Bar No. 44115 (admitted pro hac)  
16 2728 Euclid Avenue, STE 300  
17 Cleveland, OH 44115  
18 *Counsel for Plaintiff Lisa A. Bryant*

19 **IT IS SO ORDERED**

20   
UNITED STATES DISTRICT JUDGE

21 Dated: 05/09/2022